

Holland & Knight

31 West 52nd Street | New York, NY 10019 | T 212.513.3200 | F 212.385.9010
Holland & Knight LLP | www.hklaw.com

Michael J. Frevola
(212) 513-3516
michael.frevola@hklaw.com

March 31, 2015

BY ECF FILING

Hon. Analisa Torres
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: China Shipping Container Lines Co. Ltd. v. Big Port Service DMCC
Dkt. # 15-cv-02006-AT
Our File: 088492.00002

Honorable Madam:

We are counsel for Petitioner China Shipping Container Lines Co. Ltd. ("CSCL") in the above referenced proceeding. We write in response to the letter dated March 30, 2015 filed by Respondent Big Port Service DMCC ("Big Port") seeking to adjourn the hearing scheduled for Wednesday, April 1, 2015 [Doc. #15] pursuant to Your Honor's Order to Show Cause dated March 17, 2015 [Doc. #5].

CSCL objects to Big Port's request for an adjournment. The result of the Singapore Court proceeding – which is being litigated under Singapore law regarding arbitration and which only is supposed to determine whether a *prima facie* case for arbitrability has been shown – is irrelevant to this proceeding.

CSCL has not sought an order from this Court enjoining the Singapore Court's proceeding. Big Port should not try to use the Singapore Court proceeding to delay this proceeding. This is especially the case where a New York arbitration clause is at issue and this Court presumptively has jurisdiction over questions of arbitrability under such a clause.

Hon. Analisa Torres

March 31, 2015

Page - 2 -

We look forward to receiving Your Honor's decision on this issue.

Respectfully submitted,

HOLLAND & KNIGHT LLP

By: /s/ Michael J. Frevola

Michael J. Frevola

MJF:pb

#35088642_v1